

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE

In re: Michael Guglielmo\_\_\_\_,  
Debtor

Bk. No. 22-10461-BAH  
Chapter 13

DEBTOR'S OBJECTION TO CLAIM NUMBER 6

NOW COMES Michael Guglielmo, the Debtor in this case, by and through his attorney, Sandra A. Kuhn, Esq. of Family Legal Services, P.C., and files this objection to Claim Number 6. In support of this Objection, the Debtor states as follows:

1. The Debtor filed for Chapter 13 bankruptcy protection on September 21, 2022.
2. On or about October 14, 2022, Bank of America filed an unsecured claim in the amount of \$22,704.88. The proof of claim indicates that the last transaction on the account was on November 7, 2014; that the account went to chargeoff on May 30, 2015 and the last payment on the account was made on April 25, 2018.
3. The Debtor believes that the applicable statute of limitations for the creditor to collect on the subject debt has expired.
4. Given the above, the claim should be disallowed by the Court.

WHEREFORE, Debtor prays that this Court:

- A. DISALLOW Claim Number 6; AND
- B. GRANT such other relief as is just and necessary.

Respectfully Submitted,  
Mr. Guglielmo  
By His Attorney  
FAMILYLEGAL

04/02/2023  
Date

/s/Sandra A. Kuhn  
Sandra A. Kuhn, Esq.  
BNH 03832  
141 Airport Road  
Concord, NH 03301

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this Objection ALONG WITH THE PROPOSED ORDER AND NOTICE OF HEARING was sent this 2nd day of April 2023 to the following parties:

Chapter 13 Trustee  
(By ECF)

US Trustee  
(By ECF)

James Allred, Assistant Vice President  
Bank of America, NA  
As Successor by Merger to FIA Card Services, NA  
PO Box 673033  
Dallas, TX 75267-3033  
(Certified Mail RRR)

Date: 04/02/2023

/S/ Sandra Kuhn, Esq.  
Sandra Kuhn, Esq.